

EXHIBIT 2

Motion to Compel Disclosure and Request for *In Camera* Review (Doc. No. 411)*

*Where only a portion of the entry relates to the specified filing or task and the hours spent on that task are identified, those portions are underlined for the Court's convenience

Date	Narrative	Attorney	Hours Requested For Specified Filing	Fees Requested	SWA Proposed Hours	SWA Proposed Reduction
4/26/2023	Researching attorney client privilege cases re SWA burden to show that the privilege log asserts sufficient information to assert the privilege	Gilliam	0.5	\$175.00	0.15	\$122.50
4/27/2023	Reviewing appeals deadlines (.6); <u>outlining brief re compelling production of documents for which attorney client privilege is asserted (.7); researching attorney client privilege and the crime fraud exception (3.9)</u>	Gilliam	4.6	\$1,610.00	1.38	\$1,127.50
4/28/2023	Analyze subpoena issues and plans to serve subpoenas to witnesses for show cause hearing (.1); <u>researching cases re the standard for reviewing purportedly privileged documents in camera (.8); researching crime fraud exception cases related to court order violations (.4); drafting motion and brief to compel production of documents for which privilege is asserted (2.9); reviewing documents and filings related to sanctions motion (1.2); reviewing subpoena rules (.7); reviewing deadlines for filing Carter cross appeal (.6); reviewing Southwest show cause document production and analyzing SWA privilege log (2.0); outlining and organizing arguments and objections to privilege log and privilege claims for motion to compel brief (1.7)</u>	Gilliam	7.8	\$2,730.00	2.34	\$1,911.00
4/28/2023	Review documents and privilege log produced by Southwest; emails re the same	Pryor	0.3	\$148.50	0.09	\$103.50
4/28/2023	Analysis of documents and privilege log provided by Southwest re sanctions issue; email M. Gilliam re strategy points re same	Gilliam	0.4	\$158.00	0.12	\$110.00
4/29/2023	Drafting motion and brief to compel show cause hearing documents for which SWA asserts privilege	Gilliam	3.4	\$1,190.00	1.02	\$833.00
4/30/2023	Drafting motion and brief to compel show cause hearing documents for which SWA asserts privilege	Gilliam	8.7	\$3,045.00	2.61	\$2,131.50

5/1/2023	Preparing and sending information to legal assistant to prepare subpoenas for SWA and Local 556 witnesses to attend show cause hearing (1.3); revising motion and brief to compel SWA show cause hearing documents for which SWA asserts privilege (.3); communications with MLC re Carter appeals (6); phone call with MDH and BGP re subpoenas, show cause hearing, and motion to compel (.9); preparing list of issues to discuss with SWA counsel PM prior to filing motion to compel (2.0); emailing PM and BM to schedule meeting (.1)	Gilliam	3.3	\$1,155.00	0.99	\$808.75
5/1/2023	Review privilege log and Judge's show cause order re preparation for call; teleconf w/M. Hill and M. Gilliam re status and strategy	Pryor	0.7	\$346.50	0.21	\$242.35
5/1/2023	Conf. w/ M. Gilliam and B. Pryor re documents produced by Southwest and strategy for addressing same; review and comment on items to address with Southwest re documents provided	Hill	1.2	\$474.00	0.36	\$331.60
5/2/2023	Revising motion and brief to compel SWA to produce show cause hearing documents for which it asserts privilege (6.5); phone call conference with SWA counsel PM and BM and with MDH re privilege log issues and objections (.9); drafting list of issues and objections discussed during meeting to send to PM and BM (.5)	Gilliam	7.9	\$2,765.00	2.37	\$1,935.00
5/2/2023	Conf. w/ P. McKeeby, B. Morris, and M. Gilliam re document production issues; confs. w/ M. Gilliam re strategy re same; review and comment on draft email to P. McKeeby re same	Hill	1.4	\$553.00	0.42	\$387.10
5/3/2023	Revising and editing motion and brief to compel SWA to produce show cause hearing documents for which it asserts privilege, including preparation of certificate of conference (11.7); emailing SWA counsel PM and BM re privilege log issues and objections (.2)	Gilliam	11.9	\$4,165.00	3.57	\$2,915.50
5/4/2023	Revising and editing motion and brief to compel SWA to produce show cause hearing documents for which it asserts privilege, including preparing proposed order and appendix and incorporating citations	Gilliam	14.1	\$4,935.00	4.23	\$3,454.50
5/4/2023	Review draft motion re show cause hearing; review documents re the same; teleconf w/M. Hill re the same; review revised privilege log; emails re the same	Pryor	0.8	\$396.00	0.24	\$277.20

5/4/2023	Review and comment on prehearing brief re show cause order, including adding section re criminal contempt; conf. w/ B. Pryor re same; conf. w/ M. Gilliam re same; follow-up conf. w/ M. Gilliam re brief	Hill	4.2	\$659.00	1.26	\$461.90
5/5/2023	Revising, editing, finalizing, and filing motion and brief to compel SWA to produce show cause hearing documents for which it asserts privilege, including revising certificate of conference and reviewing table of contents and authorities	Gilliam	12.6	\$4,410.00	3.78	\$3,087.90
5/5/2023	Review and comment on proposed order; instruct paralegal re redaction of personal information on appendix to brief; conf. w/ M. Gilliam re strategy on brief; email M. Gilliam re redacted appendix; additional review and comment on revised brief; email exchange w/ M. Gilliam re same	Hill	1.7	671.5	0.51	\$470.55
	Total Hours / Fees		85.5	\$29,586.50	25.65	\$20,710.95